



Annual Performance Report Form

Facility Name: Rockwell Collins, Inc. - Manchester Operations

Performance Track ID #: A07-0009

Annual Performance Report #: 1

Reporting Year: 2001

Due Date: 7-1-2002

Section A

General Facility Information

To the extent possible, EPA will pre-complete items A.1-A.8 for you. Please ensure that the information in A.1-A.8 below is accurate, complete, and up to date. Please supply or revise any information as necessary and then check the box to the left of the item(s) to indicate where changes have been made. Items A.9 and A.10 cannot be pre-completed; please respond as directed in A.9 and A.10 below.

Did you make changes? If so, check box.

- A.1 ☐ Name of your facility: Rockwell Collins, Inc. - Manchester Operations
- A.2 ☐ Name of your parent company: Rockwell Collins, Inc.
- A.3 ☐ Facility contact person for the Performance Track program:
Name: Mr./Mrs./Ms./Dr. Rickie L. Pelle
Title: Director, Environmental Services
Phone: 319-295-5710 Fax: 319-295-3437 E-mail: rlpelle@rockwellcollins.com
- A.4 ☐ Facility's location:
Street Address: 901 South 10th Street
Street Address (cont.):
City/State/Zip Code: Manchester, IA 52057
- A.5 ☐ Facility's website address (if any):
- A.6 ☐ Number of employees (full-time equivalents) who currently work in the facility: < 500
- A.7 ☐ Does your company meet the Small Business Administration definition of a small business for your sector? ☐ Yes ☒ No
- A.8 ☐ North American Industrial Classification System (NAICS) Code(s) that are used to classify business at the facility: 334220 334418 _____
- A.9 ☐ In your application and, perhaps, in previous annual performance reports, you described what your facility does or makes. Have there been any (additional) changes to your facility's list of products and/or activities? If so, please list them in the space below. ☐ Yes ☒ No
- A.10 ☐ Please update the list of environmental requirements that apply to your facility. In the space below, indicate any changes that have taken place during this reporting period. If you have no changes to report, please write "No changes."
"No Changes"

Section B

Environmental Management System

B.1 Environmental Management System Assessment. Please summarize EMS assessments conducted *during the year*. Attach additional sheets as necessary.

- a. Was an EMS audit or other assessment done by an independent third party?

☒ Yes ☐ No

If yes, please provide the *type* (e.g., ISO 14001 certification), the *scope*, and the *dates* (mo/yr) of each assessment.

Type: ISO 14001:1996

Scope: All elements of the standard and all areas of the facility

Date: April 2001

- b. Was an internal or corporate EMS audit conducted? ☒ Yes ☐ No

If yes, please provide the *scope* and the *dates* (mo/yr) of each audit.

Type: ISO 14001:1996

Scope: ISO 14001 Standard Elements and Rockwell Collins environmental policies and procedures.

Date: September 13, 2001

- c. Was a compliance audit conducted? ☒ Yes ☐ No

If yes, please provide the *scope* and the *dates* (mo/yr) of each audit, and indicate *who* conducted the audit(s) (e.g., facility staff, corporate groups, third party).

Type: Compliance

Scope: Applicable state, federal and local regulations and Rockwell Collins environmental policies and procedures.

Date: August 14, 2001

Auditor: Rockwell Collins Environmental Services corporate staff

- d. (Optional) If you would like to describe any other audits or inspections that were conducted at your facility, please do so here.

Type: Air Compliance

Scope: Permit conditions and limits of all the emission points in the facility.

Date: September 26, 2001

Auditor: Iowa Department of Natural Resources - Air compliance section performed a random audit where they inspected all the emission points in the facility.

Section B

(continued)

B.1

e. Briefly summarize corrective actions taken and other improvements made as a result of your EMS assessments and compliance audits.

To ensure consistent application of ISO 14001 requirements, the facility environmental engineer and coordinator attended a day-long meeting with other Rockwell Collins Performance Track facilities to review internal EMS findings. As a result of the meeting and the findings, several clarifications and revisions were made to Rockwell Collins environmental procedures, including definition of how quickly a procedure change needs to be implemented at each facility; incorporation into the EMS of internal communications to track actual and potential regulatory and procedure changes; incorporation into the EMS of a revised environmental incident reporting system; revision to impact scoring that requires large quantity generators and major air emission sources to consider the hazardous waste and air aspects, respectively, as significant; implemented satellite accumulation area registration for routine internal inspection; and implemented an electronic container tracking system for hazardous, universal and controlled waste to ensure storage time limits, if applicable, are not exceeded.

f. Has your facility corrected all instances of potential non-compliance and EMS non-conformance identified during your audits and other assessments?

☒ Yes ☐ No ☐ No such instances identified

If no, please explain your plans to correct these instances.

g. When was the last Senior Management review of your EMS completed? *mo/yr* January 7, 2001

Who headed the review?

Name: Mr./Mrs./Ms./Dr. Christine Bockenstedt

Title: Facilitator

Section B

(continued)

B.2 ISO 14001 Certification. Is your facility currently certified to ISO 14001? ☒ Yes ☐ No

B.3 Environmental Aspects Identification. When did your facility last conduct a systematic identification and/or review of your environmental aspects? *mo/yr* 09/13/01

B.4 Progress Toward Achieving Objectives and Targets. In the table below, please provide a narrative summary of progress made toward EMS objectives and targets. **You may limit the summary to environmental aspects that are *significant* and towards which *progress* has been made during the *reporting year*.** In cases where progress relates specifically to a Performance Track performance commitment, complete the *Environmental Aspect* column, but in the *Progress* column simply refer to the performance commitment tables in Section C, i.e. "See Section C." Attach additional sheets as necessary.

<i>Environmental Aspect</i>	<i>Progress Made This Year</i> (e.g., quantitative or qualitative improvements, activities conducted)
Total Material Usage (Toluene)	See performance commitment C1
Hazardous Solid Waste (Liquid Flammable Waste)	See performance commitment C2
Total Solid Waste	See performance commitment C3
Emissions of VOCs	See performance commitment C4

Section C

Environmental Performance Commitments

Please use the tables on pages 6-9 to summarize your facility's environmental performance against your Performance Track performance commitments. Complete only those boxes related to the baseline, current year, and performance commitment. If any of the boxes have been pre-completed for you, please verify the information. If you find information that is incorrect, cross it out and write in the correct information. **Leave blank any columns for future reporting years.**

C.1

Performance Commitment 1

a. Use this table to report data related to your first performance commitment.

Category (see page 16 of the instructions): Materials Use

Aspect (see page 16 of the instructions): Total Material Usage (Toluene)

	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	2000	2001	2002	2003	2003
<i>Actual Quantity (per year)</i>	4783.32	4587.64			(optional)
<i>Measurement Units</i>	Pounds				
<i>Normalizing Factor*</i>	1.0	0.835			(optional)
<i>Basis for your Normalizing Factor*</i>	Top Level Units Produced (Including Post Coat Top Level)				
<i>Normalized Quantity* (per year)</i>	4783.32	5493.57			4348.48

*See pages 17-19 of the instructions for more information

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

Due to the viscosity requirements of the new machine and handpainting process, less toluene was needed to mix with humiseal in the postcoat area and by switching to more to handpainting, less toluene was needed to clean equipment. The increase was caused by stripping humiseal from boards for other facilities. Studies are being conducted to investigate the efficiency of this process.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

Waste Wise

Section C

(continued)

C.2 Performance Commitment 2

a. Use this table to report data related to your second performance commitment.

Category (see page 16 of the instructions): Waste					
Aspect (see page 16 of the instructions): Hazardous Solid Waste (Liquid Flammable Waste)					
	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	2000	2001	2002	2003	2003
<i>Actual Quantity (per year)</i>	12,335	11,270			(optional)
<i>Measurement Units</i>	Pounds				
<i>Normalizing Factor*</i>	1.0	1.2			(optional)
<i>Basis for your Normalizing Factor*</i>	Top Level Units Produced				
<i>Normalized Quantity* (per year)</i>	12,335	9,406			10,135
*See pages 17-19 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

The facility will handpaint more boards rather than sending them through the conformal coating machine thus generating less waste due to overspraying. Acetone used to clean fixtures will be replaced by water in a future process.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

Section C

(continued)

C.3

Performance Commitment 3

a. Use this table to report data related to your third performance commitment.

Category (see page 16 of the instructions): Waste

Aspect (see page 16 of the instructions): Total Solid Waste

	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	2000	2001	2002	2003	2003
<i>Actual Quantity (per year)</i>	39,865	37,720			(optional)
<i>Measurement Units</i>	Pounds				
<i>Normalizing Factor*</i>	1.0	1.2			(optional)
<i>Basis for your Normalizing Factor*</i>	Top Level Units Produced (Including Post Coat Top Level)				
<i>Normalized Quantity* (per year)</i>	39,865	31,480			31,798

*See pages 17-19 of the instructions for more information

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

The facility has a comprehensive recycling program that includes recycling such items as paper, notebooks, static-proof bags, metals, toner cartridges, some types of plastics and much more.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

Section C

(continued)

C.4 Performance Commitment 4

a. Use this table to report data related to your fourth performance commitment.

Category (see page 16 of the instructions): Air Emissions

Aspect (see page 16 of the instructions): Emissions of VOCs

	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	2000	2001	2002	2003	2003
<i>Actual Quantity (per year)</i>	48060.0	10962.0			(optional)
<i>Measurement Units</i>	Pounds				
<i>Normalizing Factor*</i>	1.0	0.835			(optional)
<i>Basis for your Normalizing Factor*</i>	Top Level Units Produced (Excluding Post Coat Top Level)				
<i>Normalized Quantity* (per year)</i>	48060.0	13124.0			25000.0

*See pages 15-17 of the instructions for more information

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

The baseline was modified from the initial application because the facility is in the process of modifying air permits to get a bubble permit. VOCs will be tracked using purchases and assuming 100% emitted. This will capture point source and fugitive emissions from the entire facility.

By switching from a conformal spray coating process to a hand painting process, less VOCs are generated when mixing and applying.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

Section D

Public Outreach and Performance Reporting

D.1

Please briefly summarize the public outreach and reporting activities that your facility has conducted during the year. Feel free, but not obligated, to attach supporting materials (e.g., meeting agendas, public announcements).

The Rockwell Collins Annual Environmental, Health and Safety report was made publicly available on the Rockwell Collins web site (www.rockwellcollins.com).

In addition, this annual report will be added to the Rockwell Collins web site. Hard copies will be sent to the Manchester Public Library, and to the individuals that served as references in our initial application. A press release will be sent to the mayor's office and the local media.

Manchester Operations has implemented a robust recycling and reuse program for packaging materials. The recycling/reuse program addresses community needs through its use of a local organization for special needs adults to sort packaging materials for reuse.

D.2

Please indicate which of the following methods your facility plans to use to make its Performance Track Annual Performance Report available to the public. Please check as many as are appropriate.

☒ Website (URL www.rockwellcollins.com)

☐ Open House

☐ Meetings

☒ Press Releases

☐ Community Advisory Panel

☒ Other See response to D1.

Section E

On behalf of Rockwell Collins, Inc. - Manchester Operations,
(name of my facility)

I certify that

- ◆ I have read and agree to the terms and conditions specified in *the National Environmental Performance Track Program Guide*. This facility, to the best of my knowledge, continues to meet all program criteria;
- ◆ I have personally examined and am familiar with the information contained in this Annual Performance Report. The information contained in this report is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete;
- ◆ My facility has an environmental management system (EMS), as defined in the Performance Track EMS criteria, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- ◆ My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements; and the facility has corrected all identified instances of potential or actual noncompliance; and
- ◆ Based on the foregoing compliance assessments and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Performance Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior manager with responsibility for the facility and am fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is part of the National Environmental Performance Track program.

Signature/Date _____

Printed Name Mr./Mrs./Ms./Dr. Michael J. Sebeny

Title Director, Manchester Mfg. Operations

Phone Number/E-mail Address (319)295-9910 / mjsebeny@rockwellcollins.com

Facility Name Rockwell Collins, Inc. - Manchester Operations

Facility Street Address 901 S. 10th Street

Performance Track Identification Number A07-0009

Paperwork Reduction Act Notice

The public reporting and recordkeeping burden for this collection of information is estimated to average 188 hours per respondent annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.